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March 17, 2021

Via ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Room 435
New York, NY 10007

USDC SDNY
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Re: United States v. Hernandez, et al. – Edwin Santana
Docket No. 18-cr-420 (ALC)

Dear Judge Carter:

We represent defendant Edwin Santana in the above-captioned matter. The Court has scheduled a sentencing hearing in Mr. Santana's case for Friday, April 16 at 2:00 p.m. (although we understand that date may be subject to change in light of continued operational restrictions at the Court). *See* ECF No. 653. We write to respectfully request a temporary modification of the terms of Mr. Santana's release to allow him to travel to Puerto Rico to visit his ailing grandmother before his sentencing.

Hon. Andrew L. Carter, Jr.
March 17, 2021
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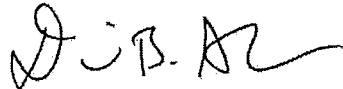
Mr. Santana's grandmother, who lives in Puerto Rico, suffers from a bone disease and diabetes, and is currently in the hospital. In 2019, the Court granted Mr. Santana's prior requests to temporarily modify the terms of his release to permit him to visit her in Puerto Rico at that time. *See* ECF Nos. 286, 342. However, for work and personal reasons, Mr. Santana was unable to make the trip at that time. The trip would last from March 29 through April 5. Mr. Santana would stay with family for the duration of his visit.

Pretrial Services has informed us that it takes no position on this request, provided that Mr. Santana provides Pretrial Services with certain information regarding his travel and lodging arrangements. The government has informed us that it defers to the position of Pretrial Services with respect to this request.

In the nearly three years since he was released under pretrial supervision in July 2018, Mr. Santana has complied fully with the conditions of his release and has earned multiple favorable revisions to those conditions in light of his good behavior—enabling him to, among other things, work in other boroughs and in New Jersey, take high-school equivalency courses, care for his ailing mother in a New Jersey hospital and, eventually, to freely move about the city without a curfew or electronic monitoring. *See* ECF Nos. 137, 191, 207, 241.

We respectfully request that the Court grant this request.

Very truly yours,



David B. Anders

cc: AUSA Christopher Clore (via ECF)
AUSA Jacob Miller (via ECF)
Pretrial Services Officer Courtney DeFeo (via email)

The application is **GRANTED**.
So Ordered.



3-17-21